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Counsel for Plaintiffs, Opt-in Plaintiffs and Putative Class

[Additional Counsel for Plaintiffs, and Counsel for Defendant, listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**JOINT STATUS REPORT AND
REQUEST FOR STAY**

Plaintiffs Kelly Cahill, Sara Johnston, Lindsay Elizabeth, and Heather Hender (“Plaintiffs”) and Defendant Nike, Inc. (“Nike”) (collectively, the “Parties”) by and through their respective counsel, submit the following Joint Status Report and Request for Stay pursuant to the Court’s March 21, 2023 Order (Dkt. No. 336):

The Parties have conferred regarding the status of the immediate action. In light of the fact that Plaintiffs will file a Fed. R. Civ. P. 23(f) petition with the Ninth Circuit Court of Appeals on April 4, 2023 requesting permission to appeal this Court’s denial of Plaintiffs’ motion for class certification, the Parties agree that good cause exists for the Court to stay the litigation of this matter—and to withhold on setting further case management deadlines—until the resolution of Plaintiffs’ forthcoming Rule 23(f) petition.

The Parties further agree that, within 14 days of the latter of (a) denial of Plaintiffs’ forthcoming Rule 23(f) petition, or (b) resolution of Plaintiffs’ Rule 23(f) appeal, if permitted, they will jointly submit an updated Joint Status Report to the Court and/or schedule a Case Management Conference.

Dated: April 4, 2023

Respectfully submitted,

GOLDSTEIN, BORGES, DARDARIAN & HO

/s/ James Kan

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Dated: April 4, 2023

Respectfully submitted,

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